

Appln. No. 09/994,544
Amdt. dated July 26, 2005
Reply to Office Action of May 26, 2005
Docket No. DE9-2000-0031 (267)

REMARKS/ARGUMENTS

These remarks are made in response to the Office Action of December 16, 2005 (Office Action). As this response is timely filed within the 3-month shortened statutory period, no fee is believed due.

Claims 1, 13, 20 and 21 were rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 5,515,490 to Buchanan, *et al.* (Buchanan) in view of U.S. Patent No. 5,649,060 to Ellozy, *et al.* (Ellozy) and further in view of the publication titled "Cooperative Use of MHEG-5 and HyTime," by Rutledge *et al.*, published by Proceedings of Hypertext and Hypermedia, 1997 (hereinafter Rutledge). Claims 2-3 and 14 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Buchanan in view of Ellozy and Rutledge, and further in view of the publication titled "Synchronization Relation Tree: A Model for Temporal Synchronization in Multimedia Presentation," by Kim, *et al.*, published as Technical Report TR92-42, Department of Computer Science, University of Minnesota, 1992 (hereinafter Kim).

Claims 7 and 19 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Buchanan, Ellozy, Rutledge, and Kim, and further in view of U.S. Patent No. 5,731,847 to Tsukagoshi, *et al.* and the publication titled "Using the Strategy Design Pattern to Compose Reliable Distributed Protocols," by Garbinato, *et al.*, published by the USENIX Conference on Object-Oriented Technologies and Systems (hereinafter Garbinato). Claim 8 was rejected under 35 U.S.C. § 103(a) as being unpatentable over Buchanan, Ellozy, Rutledge, and Garbinato. Claim 9 was rejected under 35 U.S.C. § 103(a) as being unpatentable over Buchanan, Ellozy, Rutledge, and Garbinato, in view of Tsukagoshi. Claim 10 was rejected under 35 U.S.C. § 103(a) as being unpatentable over Buchanan, Ellozy, Rutledge, Garbinato, and Tsukagoshi, in view of Kim. Claims 11-12

Appln. No. 09/994,544
Amdt. dated July 26, 2005
Reply to Office Action of May 26, 2005
Docket No. DE9-2000-0031 (267)

were rejected under 35 U.S.C. § 103(a) as being unpatentable over Buchanan, Ellozy, Rutledge, Garbinato, Tsukagoshi, and Kim in view of the publication titled "Detection of Target Speakers in Audio Database," by Magrin-Chagnolleau, published by ICASSP, 1999 (hereinafter Magrin-Chagnolleau).

Applicants' Invention

It may be useful at this juncture to reiterate certain aspects of Applicants' invention. One embodiment of the invention is a computer-based method of synchronizing a realization of a media stream having at least one version of content and having a first representation synchronized with said realization, and at least one second representation. The method can include determining structure information for the first representation and at least one second representation. The method further can include determining structure association information between the first representation and the at least one second representation. The structure association information, more particularly, can include semantic structure association information.

Additionally, the method can include synchronizing the at least one second representation with the first synchronized representation and the realization using the semantic structure association information. The method also can include aligning the at least one version of content with the first representation to produce a web of relations between a structural view of the at least one version of content and the first representation.

The Claims Define Over The Prior Art

As already noted independent Claims 1 and 13 were rejected as unpatentable over Buchanan, Ellozy, and Rutledge. Claim 8 was rejected as unpatentable Buchanan, Ellozy, Rutledge, and Garbinato.

Appln. No. 09/994,544
Amdt. dated July 26, 2005
Reply to Office Action of May 26, 2005
Docket No. DE9-2000-0031 (267)

Buchanan is directed to a system and related methods for temporally formatting data presentations in time-dependent documents. Primarily, Buchanan is concerned with the generation and scheduling of time-dependent, multi-media presentations. Accordingly, any structural information in Buchanan is primarily the temporal metadata of the media item.

Buchanan, accordingly, does not teach or suggest the use of structure association information, as recited in each of the independent claims. It is stated at pages 4 and 18-12, however, that Ellozy teaches synchronizing representations using semantic structure association information. In a portion cited in the Office Action, Ellozy describes aligning speech data and a summary script, which are not inherently time correlated, based on matching summary script sentences to "anchor points". (See Col. 9, line 62 – Col. 10, line 15.) But Ellozy's alignment is not based upon semantic structure association, but rather it remains based on temporal information. This is made explicit in the portion cited, where it is explicitly stated that the use of the anchor points is precisely because "the anchor points carry time stamps [so as to] achieve a time alignment between the summary script and the speech data." (Col. 10, lines 10-15.)

Thus, notwithstanding that Ellozy notes that a summary script and speech data often do not have time correlation, Ellozy nonetheless relies on time-based information to achieve alignment of a summary script and speech data. As the cited portion makes explicit, Ellozy does not teach or suggest aligning one representation with another without relying on temporal information. Accordingly, even when combined, Buchanan and Ellozy do not teach or suggest synchronizing at least one representation with another representation based on semantic structure association information, as recited in each of the independent claims.

Moreover, neither Ellozy nor Buchanan discusses aligning at least one version of content with a first representation to produce a web of relations between a structural view of at least one version of content and a representation, as further recited in each of the

Appln. No. 09/994,544
Amdt. dated July 26, 2005
Reply to Office Action of May 26, 2005
Docket No. DE9-2000-0031 (267)

independent Claims. At pages 4 and 20 of the Office Action, it is asserted that this feature is found in Rutledge. Applicants respectfully maintain, however, that whatever relations may be found in Rutledge they are not between a structural view of a version of content and a representation, as expressly recited in each of the independent claims. Rutledge is directed to complex hyperlinking; it does not teach or suggest the steps of aligning a version of content with a first representation to produce a web of relations between a structural view of a version of content with and the first representation.

Rutledge is a general, comparative examination of the MHEG-5 and HyTime standards for hypermedia documents. Yet while Applicants' invention can be implemented using the convenient syntax of HyTime, as described in the Specification, nothing about the HyTime standard suggests the particular features of the invention. The portion of Rutledge referred to in the Office Action is merely a summary of past efforts to standardize the coding of multimedia and hypermedia information. Nothing in Rutledge's reiteration of these efforts to standardize multimedia and hypermedia coding, however, suggest anything about a web of relations between a structural view of at least one version of content and a representation, as recited in each of the independent claims.

Accordingly, even when combined, none of the references teach or suggest every feature recited in independent Claims 1, 8, and 13. Applicants respectfully submit, therefore, that the claims define over the prior art. Applicants further respectfully submit that whereas each of the remaining claims depend from one of Claims 1, 8, or 13, the remaining dependent claims likewise define over the prior art.

CONCLUSION

The Applicants believe that this application is now in full condition for allowance, which action is respectfully requested. The Applicants request that the Examiner call the undersigned if clarification is needed on any matter within this Response, or if the

Appln. No. 09/994,544
Amdt. dated July 26, 2005
Reply to Office Action of May 26, 2005
Docket No. DE9-2000-0031 (267)

Examiner believes a telephone interview would expedite the prosecution of the subject application to completion.

Respectfully submitted,

Date: March 16, 2006

Richard A. Hinson

Gregory A. Nelson, Registration No. 30,577
Richard A. Hinson, Registration No. 47,652
Marc A. Boillot, Registration No. 56,164
AKERMAN SENTERFITT
Customer No. 40987
Post Office Box 3188
West Palm Beach, FL 33402-3188
Telephone: (561) 653-5000